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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA

In re)	In Proceeding Under
)	Chapter 11
Jason Ronald Roggensee)	
)	Case No. 08-07826 RJH
)	
Debtor.)	
)	Adv. No. 10-00411 RJH
)	
Jason Ronald Roggensee)	
)	
Plaintiff.)	APPLICATION FOR ENTRY OF
)	DEFAULT
v.)	
)	(Re: 4376 South Hemet Street
Countrywide Home Loans, Inc.)	Gilbert, AZ)
and/or its Assignee or Successor)	
Real Time Solutions, Inc.)	
)	
Defendants.)	
)	

Comes now the Plaintiff, Jason Ronald Roggensee, by and through counsel, Allan C. NewDelman, P.C. and state the following:

1.

This adversary action was opened with the filing of a Complaint to Determine the Validity, Priority or Interest in Property was filed against the Defendants, Countrywide Home

1 Loans, Inc. and/or its Assignee or Successor, Real Time Solutions, Inc. on March 16, 2010.

2 2.

3 A summons was issued to the Defendants by the Clerk of the Court on March 17, 2010
4 and immediately served upon the Defendants (See Docket No. 5) on March 17, 2010.
5

6 3.

7 The deadline to respond to the Summons was April 17, 2010. No timely response has
8 been filed either by the Defendants or on the Defendants' behalf.
9

10 4.

11 As a result of the Defendant's failure to file a timely response to the Complaint, the
12 Plaintiff is entitled to move for an entry of default against the Defendants.

13 5.

14 Plaintiff moves the Clerk of the Court to enter an entry of default the Defendants.

15 Respectfully submitted this 21st day of April, 2010.
16
17

18 /s/ Allan D. NewDelman
19 Allan D. NewDelman
20 Counsel for the Plaintiff
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1 A copy of the foregoing
2 mailed this 21st day
3 of April, 2010, to:

4 Countrywide Home Loans Bank
5 c/o CT Corporation System
6 2394 East Camelback Road
7 Phoenix, AZ 85016

8 Dean R. Prober, Esquire
9 Polk, Prober and Raphael
10 20750 Ventura Blvd
11 #100
12 Woodland Hills, CA 91364
13 Counsel for Countrywide Home Loans, Inc.

14 Gerard R. O'Meara, Esquire
15 Gus Rosenfeld, P.L.C.
16 1 South Church Avenue
17 Suite 1900
18 Tucson, AZ 85701-1620
19 Counsel for Countrywide Home Loans, Inc.

20 Real Time Solutions, Inc.
21 1750 Regal Row
22 Suite 120
23 P.O. Box 36655
24 Dallas, TX 75235

25 Jason Ronald Roggensee
26 2721 East Tamarisk St
27 Gilbert, AZ 85296
28 Debtor

23 /s/ R. Scott Graves
24 R. Scott Graves
25 Paralegal